

### **REMARKS**

The enclosed is responsive to the Examiner's Office Action mailed on September 18, 2008. At the time the Examiner mailed the Office Action claims 126-129, 131-140 and 142-154 were pending. By way of the present response the Applicant has: 1) amended claims 126, 127, 132, 134, 137, 138, 142, and 144-152; 2) added no new claims; and 3) canceled claim 143. As such, claims 126-129, 131-140, 142, and 144-154 are now pending. Applicant respectfully requests reconsideration of the present application and the allowance of all claims now represented.

### **Examiner Interview**

Applicant thanks Examiner Basehoar for conducting a telephone interview with Applicant's representative on January 12, 2009 to discuss the claims of the application and the significance of the art cited in relation to the claims. The parties discussed the claim feature of independent claim 126 of automatically generating program code. Applicant's representative argued that OmniForm alters the existing form rather than automatically generating program code. The parties further discussed a potential amendment to emphasize that the generated program code is separate from the form.

### **Claim Amendments**

Applicant has amended the claims to correct typographical errors, improve the readability of the claims, and to more particularly point out what Applicant regards as the invention. In particular, Applicant has amended the claims corresponding to the proposed amendment discussed in the Examiner Interview, i.e., wherein the program code is external to the form. Support for the amendments is found in the specification as originally filed, e.g., see Figure 3 and related text on pages 14-15. No new matter has been added as a result of these amendments.

### **Claim Rejections**

Claims 126, 127, 129, 131-134, 136-138, 140, 142-146-148-154 stand rejected under 35 U.S.C. 103(a) as being unpatentable over OmniForm User's Manual (hereinafter OmniForm), Caere Corporation, released March 22, 1999 (as evidenced by cited PR NewsWire article), pages 1-108, 173-199, in view of Larson, U.S. Patent 6,088,700 (hereinafter "Larson").

OmniForm describes the generation of an HTML form and the editing of an existing form by a user. (OmniForm, e.g., pages 25-43.) This editing may be performed through a GUI. (OmniForm, e.g., page 32). In particular, OmniForm describes that fill text objects can be configured with a validation option that allows the form author to select whether a field must be filled in, a type of data to be inputted, etc. (OmniForm, page 76).

Larson describes a system for automated form completion. The system completes forms by retrieving tagged information previously entered by a user and stored in a database and inserting the information in similarly tagged fields in the form.

Regarding claims 126, 132, and 137, the combination of OmniForm and Larson fails to disclose automatically generating program code to carry out the actions associated with the identified input fields, wherein the program code is external to the form. OmniForm describes opening and editing an existing form. The Office Action relies upon OmniForm in the rejection of this claim feature. Applicant respectfully submits that the OmniForm reference does not disclose generating program code external to the form.

Given that OmniForm is a user's manual and lacks detail in regard to the implementation of the described functionality, Applicant has provided in an IDS including five archived webpages that further describe the OmniForm 4.0 software. (see IDS submitted herewith). "OmniForm automatically creates JavaScript which performs calculations and validation **embedded in the forms in the browser – not at the server.**" (ScanSoft OmniForm 4.0: Why should you upgrade?, page 3 and ScanSoft OmniForm 4.0 – Fact Sheet, page 5). The Internet Suite boasts that no CGI is necessary and that client-side validation is

supported on the client-side at the browser. (ScanSoft OmniForm Internet Suite, page 3). However, forms “can be processed using ‘Get,’ which will append the data to the URL specified in the Action option, or using ‘Post’ to notify the Web server to open the CGI application and pass the data.” (ScanSoft OmniForm 4.0: Why should you upgrade?, page 3). While “OmniForm works with CGI scripts on web servers just like regular HTML forms do,” the author or administrator of the form still must provide the CGI script. (ScanSoft OmniForm 4.01 Sample Perl Scripts, page 1).

The OmniForm website provided example scripts and a separate program, ScanSoft’s CGI Wizard, to assist a user with the creation of the scripts. (ScanSoft OmniForm 4.01 Sample Perl Scripts, page 1). Applicant does not admit that the CGI Wizard is prior art. Nevertheless, even if the CGI Wizard is treated as prior art, it fails to disclose all of the features of the independent claims. The CGI Wizard could take a CGI template and an OmniForm, match predefined variables in the template with embedded fields in a form, and output a CGI Perl Script. (ScanSoft CGI Wizard for OmniForm 4.01, pages 1-2). The CGI Wizard is able to fill in predefined variables, but requires the template CGI script to be written in advance – i.e., the user is still required to write or provide a CGI script. Additionally, the CGI script, as modified by the CGI Wizard, is not automatically generated to carry out the actions associated with the identified input fields – i.e., identified through a graphical user interface as described in the preceding claim feature.

Not only does OmniForm fail to generate program code external to the form, but the archived website further provides evidence of the difficulty of creating the external program code. The website stated that “CGI applications are powerful and useful, but are not intended for novice computer users. **They require a high level of technical knowledge to be implemented properly.**” (ScanSoft OmniForm 4.01 Sample Perl Scripts, page 1) (emphasis added). ScanSoft provided sample scripts “as is” due to the difficulty of implementation. Accordingly, Applicant submits that the OmniForm website provides evidence not only that the reference lacks this claim feature, but that the discussed claim

feature is not obvious in light of the level of difficulty in implementing a CGI script that will work with a form created by a user.

Therefore, neither OmniForm nor the CGI Wizard, alone or combined, would automatically generate program code to carry out the actions associated with the identified input fields, wherein the program code is external to the form. Additionally, it is respectfully submitted that Larson also fails to disclose generating program code.

Accordingly, Applicant respectfully submits that the rejection of claim 126, 132, and 137 has been overcome.

Given that claims 127-129, 131, 133-136, 138-140, 142, and 144-154 are dependent upon claims 126, 132, and 137, and include additional features, Applicant respectfully submits that the rejection of claims 127-129, 131, 133-136, 138-140, 142, and 144-154 has been overcome for at least the same reasons as above.

Furthermore, Applicant disagrees with the specific rejection of dependent claims. In the interest of brevity, Applicant will only provide arguments for a few of the dependent claims and reserve the right to provide arguments for the remainder of the dependent claims at a later time should the rejections be maintained.

Regarding claims 131, 136, and 142, the combination of OmniForm and Larsen fails to disclose a method, server, or machine readable medium to determine that the generated program code is consistent with the form and generating an alert if the generated program code is not consistent with the form. The Office Action alleges that OmniForm teaches validation options for validating input and that if the input does not validate, the user is notified. (Office Action dated 9/18/08, page 5). Applicant respectfully submits that OmniForm describes a validation option for determining that **a user input into a text field complies with a rule** – e.g., a mandatory field may not be left blank, the type or size of input, etc. Nevertheless, OmniForm does not disclose generating an alert when it is determined that **the generated program code is not consistent with the form**. As discussed above, OmniForm does not generate

program code external to the form. Additionally, OmniForm does not describe determining consistency between a form and generated program code. While the CGI Wizard may use a form to fill in predetermined variables in a template CGI script, it does not determine consistency or generate an alert if an inconsistency is found.

Accordingly, Applicant respectfully submits that the rejection of claim 131, 136, and 142 has been overcome for these reasons in addition to the arguments above relating to the independent claims.

### **CONCLUSION**

Applicant respectfully submits that all rejections have been overcome and that all pending claims are in condition for allowance.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Ryan W. Elliott at (408) 720-8300.

Respectfully submitted,

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